

# EXHIBIT D



data received from internal and external sources; advising on risk mitigation strategies; disseminating security alerts to management and staff; overseeing security incident response planning and investigation of breaches; and preparing and submitting incident reports per Planned Parenthood and regulatory requirements. I submit this Declaration in support of Defendants' Response to Plaintiffs' Motion for Entry of Protective Order in the above-captioned action. I have personal knowledge of the facts contained herein.

2. Information regarding threats, intimidation, and/or harassment that I receive comes from various sources, including directly from employees, patients, and other individuals; via PPGC's security surveillance camera system; from open-source intelligence searches, as well as information and reports received from my own observations. The information reported, along with my investigation, is entered into PP's Affiliate Incident Management System (AIMS) reporting system. If warranted, I also report the threat/intimation/harassment to law enforcement.

3. In the course of my duties at PPGC, I regularly receive and respond to information about security threats, harassment, violence and threatened violence, and intimidation against our staff, patients, and facilities. Below are examples of such incidents reported logged in the AIMS system regarding incidents experienced by PPGC staff.

4. Doe 9,<sup>1</sup> then-current PPGC Director of Research and Doe 10, the Senior Director of Quality Assurance and Abortion Access, both non-public facing staff, suffered immense harassment after the 2015 video release by Relator. In the days and weeks following Relator's publication of a video featuring Doe 9 and Doe 10, they received a combined nine or more threats in the form of physical mail, voicemail, and social media, which resulted in the involvement of the

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<sup>1</sup> In order to maintain the anonymity of the individuals referenced in this declaration, I refer to the PPGC current and former staff referenced in this declaration as Doe 9 and Doe 10, and I refer to the individuals who have sought to intimidate or harass the PPGC staff as Smith 5, Smith, 6, etc.

U.S. Marshal's Service. The harassment tapered off over time, but even as recently as September 2021, Doe 9 still received hate mail with disturbing contents.

5. When PPGC or any of its staff receive an email, letter, or voicemail identified as a security threat I use open source intelligence methods to determine who the poster or caller is, if the poster or caller is local, what other posts or calls this person has made, whether the caller may be in town or otherwise have means to bring harm to the target, and whether PPGC has any other history with this individual.

6. On August 5, 2015, I was informed that multiple Facebook users made death threats against Doe 9 and generally against other PPGC employees. After the videos were released, someone under Facebook using the name Smith 5 posted "[w]hy do I see a lot of killings of PP doctors and bombings in the near future?" Another user named Smith 6 replied that "what I have seen will make me want to hunt you for the rest of your lives." I reported this threat to law enforcement and the U.S. Marshals became involved. The U.S. Marshals went to Doe 9's home, performed a threat assessment, and discussed home security measures with her. Contemporaneously PPGC assisted Doe 9 in installing security cameras at and around her house.

7. On August 6, 2015, an anonymous user left a hateful message on Doe 9's voice mail. The voice mail stated that they planned to do "everything in their power to remove you from your position" and that the caller was "coming for [Doe 9]."

8. On August 7, 2015, a death threat was made against Doe 9 on Facebook. Someone under the name "Smith 7" posted to "Kill this murder-b##ch!"<sup>2</sup> on Doe 9's Facebook wall.

9. On August 10, 2015, a threatening letter was sent to Doe 9 with a return address listed in Houston, Texas. The letter called Doe 9 a series of expletives and closed with the

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<sup>2</sup> Because I understand this declaration will be filed publicly, I have censored the curse words that were used in the original communications and postings.

statement that the sender hopes “she goes to prison until she f###king dies.” The letter was written on top of a printout of a Daily Caller Article titled “Planned Parenthood Transcript: Nurse Admits It’s ‘Fun’ To Dissect Fetuses.”

10. On September 6, 2015, a concerning and rambling letter regarding the videos was sent to Doe 9’s work address by a woman named “Smith 8.” I was required to perform a threat assessment in response to this letter. This was the first of three letters sent by “Smith 8” to Doe 9. The other letters were of a similar concerning and rambling nature. Doe 9 received the second letter on January 22, 2016.

11. On October 6, 2015, Doe 10 was identified in an email from Operation Rescue, an active pro-life organization. Her name in this email distribution led to increased threats and commentary on Doe 10 on social media, including harassing pictures and comments.

12. On September 30, 2021, Doe 9 received hate mail at the office. At the time, Doe 9 no longer worked at PPGC.

13. It is my personal and professional opinion that PPGC employees have some exposure to threats, intimidation, and/or harassment by virtue of their work for and association with PPGC. Accordingly, I advise them about their exposure on open public searches and encourage them to use maximum privacy settings online. I encourage them not to park in the same parking spaces; to travel different routes to and from work; to vary their schedule as much as possible; and not to wear their ID name badges or any work clothes or uniforms that identify them as working for PPGC while off-site. Nevertheless, incidents like those described above still occur despite our employees’ best efforts to remain anonymous and keep their employment with PPGC confidential.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 27, 2022.

A handwritten signature in cursive script, appearing to read "Larissa Lindsay", written in black ink.

Larissa Lindsay  
Senior Director of Security and Facilities,  
Planned Parenthood Gulf Coast, Inc.